

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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OXFORD HEALTH INSURANCE, INC.,  
OXFORD HEALTH PLANS (NY), INC.,  
UNITED HEALTHCARE INSURANCE  
COMPANY OF NEW YORK, INC., and  
UNITED HEALTHCARE SERVICES, INC.,

Plaintiffs,

-against-

DANIEL HAMNER, M.D., DANIEL HAMNER  
PHYSICIAN, P.C., DANIEL HAMNER,  
M.D., P.C., ALLAN CHRISTOPHER AS  
EXECUTOR FOR THE eSTATE OF ANNE M.  
CHRISTOPHER, RICHARD HAMNER,  
ERIKA MACBRIDE, RAINA HAMNER  
and RAE BAYMILLER,

Defendants.

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S I R S :

PLEASE TAKE NOTICE THAT, upon the annexed Pu Declaration and  
the Appendix annexed thereto, and the accompanying brief, and  
upon all the prior papers filed and proceedings had herein, the  
undersigned will move this Court, on 10/15/13 before the Hon.  
Alvin K. Hellerstein, at 500 Pearl Street, New York, NY, Rm. 1050 , New York, NY at 9:30 a.m. or as soon thereafter as  
counsel can be heard, for orders:

1. pursuant to FRCP Rule 12(b)(5) to quash  
service;

2. pursuant to FRCP Rule 12(b)(6) and Rule 9 to

dismiss Plaintiffs' Amended Complaint (the "AC") for failure to state a claim.

and for further relief as the Court deems just and proper.

Dated: New York, NY  
September 4, 2013



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Richard Pu, Esq. (RP2321)  
Attorney for Defendant  
Allan Christopher as Executor  
of Estate of Anne M.  
Christopher

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